UNITED STATES DISTRICT COURT
District of Minnesota

CR17-54 PJS/KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY MARCUS LUCAS,

Defendant.

INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 922(g)
18 U.S.C. § 922(j)
18 U.S.C. § 924(a)(2)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 853

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy to Distribute Methamphetamine)

Beginning in or about 2009, and continuing through on or about August 2016, in the State and District of Minnesota and elsewhere, the defendant,

JEFFREY MARCUS LUCAS,

knowingly and intentionally conspired with other persons known and unknown to the Grand Jury to possess with intent to distribute more than 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

COUNT 2
(Aiding and Abetting Possession with Intent to Distribute Methamphetamine)

On or about August 8, 2016, in the State and District of Minnesota, the defendant,

JEFFREY MARCUS LUCAS,

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aiding and abetting and being aided and abetted by others, knowingly and intentionally possessed with the intent to distribute 5 grams or more of methamphetamine (actual), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 3
(Possession of Stolen Firearms)

On or about August 8, 2016, in the State and District of Minnesota, the defendant,

JEFFREY MARCUS LUCAS,

aiding and abetting and being aided and abetted by others, knowingly and intentionally received, possessed, concealed, stored, or disposed of stolen firearms, including but not limited to: a Colt New Agent Lightweight .45 caliber pistol, serial number NNA0234; a Taurus PT22, .22 caliber pistol, serial number ANE37878; a Henry Repeating Arms, U.S. Survival, .22 caliber rifle, serial number SU008461; a Smith & Wesson Model 686-6, .357 caliber pistol, serial number CFT7654; a Marlin model 336CS, .35 caliber rifle, bearing serial number 12071448; a Winchester model 94, 30-30 caliber rifle, bearing serial number 1876809; a Marlin model 795, .22 caliber rifle, bearing serial number 00160199; Ruger model LCP, .380 caliber pistol, bearing serial number 37887793; a Ruger model Mark III, .22 caliber pistol, bearing serial number 271- 45390; a Stag Arms model Stag-15, .223 caliber rifle, bearing serial number 254260; a Hipoint 9mm rifle, bearing serial number E25760; a Norinco model MAK90 Sporter, 7.62 caliber rifle, bearing serial number 9312495; a Comanche model Super Comanche, .45/.410 caliber pistol, bearing serial number 206367; and an Uberti, Aldo model SAA, .45 caliber revolver bearing serial

number J15881; which were shipped or transported in foreign or interstate commerce, either before or after they were stolen, knowing or having reason to know that the firearms were stolen, in violation of Title 18, United States Code, Sections 2 and 922(j).

COUNT 4
(Felon in Possession of a Firearm)

On or about August 8, 2016, in the State and District of Minnesota, the defendant,

JEFFREY MARCUS LUCAS,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Fifth Degree Possession of a Controlled Substance, in Isanti County, Minnesota, in 2007, aiding and abetting and being aided and abetted by others, did knowingly possess, in and affecting interstate and foreign commerce, firearms, namely: a Colt New Agent Lightweight .45 caliber pistol, serial number NNA0234; a Taurus PT22, .22 caliber pistol, serial number ANE37878; a Henry Repeating Arms, U.S. Survival, .22 caliber rifle, serial number SU008461; a Smith & Wesson Model 686-6, .357 caliber pistol, serial number CFT7654; a Marlin model 336CS, .35 caliber rifle, bearing serial number 12071448; a Winchester model 94, 30-30 caliber rifle, bearing serial number 1876809; a Marlin model 795, .22 caliber rifle, bearing serial number 00160199; Ruger model LCP, .380 caliber pistol, bearing serial number 37887793; a Ruger model Mark III, .22 caliber pistol, bearing serial number 271- 45390; a Stag Arms model Stag-15, .223 caliber rifle, bearing serial number 254260; a Hipoint 9mm rifle, bearing serial number E25760; a Norinco model MAK90 Sporter, 7.62 caliber rifle, bearing serial number 9312495; a Comanche model Super Comanche, .45/.410 caliber pistol, bearing serial number 206367;

and an Uberti, Aldo model SAA, .45 caliber revolver bearing serial number J15881; in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

Counts 1-4 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c).

Upon conviction of Counts 1 and 2 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of said violations, including but not limited to firearms and ammunition.

Upon conviction of Counts 3 and 4 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearm with accessories or any ammunition involved in or used in any knowing violation of sections 922(g)(1), 922(j) and 924(a)(2), including, but not limited to the following firearms:

a. Colt model New Agent Lightweight .45 caliber pistol bearing serial number NNA0234;
b. Taurus model PT 22 .22 caliber pistol bearing serial number ANE37878;
c. Henry Repeating Arms model US Survival .22 caliber rifle bearing serial number SU008461;

d. Smith & Wesson model 686-6 .357 caliber revolver bearing serial number CFT7654;
e. Marlin model 336CS .35 caliber rifle bearing serial number 12071448;
f. Winchester model 94 30-30 caliber rifle bearing serial number 1876809;
g. Marlin model 795 .22 caliber rifle bearing serial number 00160199;
h. Ruger model LCP .380 caliber pistol bearing serial number 378-87793;
i. Ruger model Mark III .22 caliber pistol bearing serial number 271-45390;
j. Stag Arms model Stag-15 .223 caliber rifle bearing serial number 254260;
k. Hipoint 9mm rifle bearing serial number E25760;
l. Norinco model MAK90 Sporter 7.62 caliber rifle bearing serial number 9312495;
m. Comanche model Super Comanche .45/.410 caliber pistol bearing serial number 206367;
n. Uberti, Aldo model SAA .45 caliber revolver bearing serial number J15881;
o. Maverick Arms model 88 12 gauge shotgun bearing serial number MV10326N;
p. Winchester model 37A 20 gauge shotgun bearing serial number C496627;
q. Ruger model 44 .44 caliber rifle bearing serial number 102-52812;
r. Ruger model mini 14 .223 caliber rifle bearing serial number 184-05999;
s. Ruger model 10/22 .22 caliber rifle bearing serial number 125-33028;
t. Mossberg model 500A 12 gauge shotgun bearing serial number P752006;
u. Taurus model The Judge .45/.410 caliber pistol bearing serial number BS632792;
v. Ruger model New Model Blackhawk .357 caliber revolver bearing serial number 33-46210;
w. American Derringer Co. .38 caliber pistol bearing serial number 95662;
x. Weihrauch, Hermann (Arminius) .22 caliber revolver bearing serial number 879954;
y. Smith & Wesson model 28 .357 caliber revolver bearing serial number N577438;
z. Harrington & Richardson model 676 .22 caliber revolver bearing serial number AU043097;
aa. Stevens model 53D .22 caliber rifle bearing no serial number;

bb. JC Higgins model 101.1 12 gauge shotgun bearing no serial number;
cc. Revolver with no markings;
dd. Revolver with no markings.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

ACTING UNITED STATES ATTORNEY	FOREPERSON